

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

x

CITY OF PROVIDENCE, RHODE ISLAND, : Civil Action No. 1:14-cv-02811-JMF
Individually and on Behalf of All Others :
Similarly Situated, : CLASS ACTION
Plaintiff, :
vs. :
BATS GLOBAL MARKETS, INC., et al., :
Defendants. :
AMERICAN EUROPEAN INSURANCE : Civil Action No. 1:14-cv-03133-JMF
COMPANY, Individually and on Behalf of All :
Others Similarly Situated, : CLASS ACTION
Plaintiff, :
vs. :
BATS GLOBAL MARKETS, INC., et al., :
Defendants. :
x

[Caption continued on following page.]

DECLARATION OF PATRICK J. COUGHLIN IN SUPPORT OF THE INSTITUTIONAL
INVESTORS' MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF COUNSEL

x

HAREL INSURANCE CO, LTD., Individually : Civil Action No. 1:14-cv-03608-JMF
and on Behalf of All Others Similarly Situated, :
Plaintiff, : CLASS ACTION
vs. :
BATS GLOBAL MARKETS, INC., et al., :
Defendants. :
:

JAMES J. FLYNN and DOMINIC A. : Civil Action No. 1:14-cv-04321-UA
MORELLI, Individually and on Behalf of All :
Others Similarly Situated, :
Plaintiff, : CLASS ACTION
vs. :
BANK OF AMERICA CORPORATION, et :
al., :
Defendants. :
:

I, PATRICK J. COUGHLIN declare, as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of New York and this Court. I am of counsel to the law firm of Robbins Geller Rudman & Dowd LLP, counsel for proposed lead plaintiffs City of Providence, Rhode Island, Plumbers and Pipefitters National Pension Fund, Employees' Retirement System of the Government of the Virgin Islands, State-Boston Retirement System, and Första AP-fonden (collectively, the "Institutional Investors") and proposed lead counsel for the class in the above-captioned actions. I make this declaration in support of the Institutional Investors' Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: Notice of pendency of first-filed class action published on *Business Wire* on April 14, 2014;

Exhibit B: The Institutional Investors' Sworn Certifications;

Exhibit C: Joint Declaration in Support of the Institutional Investors' Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Counsel;

Exhibit D: Robbins Geller Rudman & Dowd LLP firm resume;

Exhibit E: Motley Rice LLC firm resume; and

Exhibit F: Labaton Sucharow LLP firm resume.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of June, 2014 at New York, New York.

s/ Patrick J. Coughlin
PATRICK J. COUGHLIN

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2014, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 17, 2014.

s/ Patrick J. Coughlin
PATRICK J. COUGHLIN

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- (No manual recipients)